

**REMARKS/ARGUMENTS**

Claims 25-46 are pending.

Claims 3-24 are withdrawn.

Claims 3-24 were deemed to be directed to an invention independent or distinct from that of the originally filed claims. Claims 3-24 have been withdrawn.

Appended claims 25-46 are drawn to methods and apparatus for an information backup system. Arguments presented in the response filed May 18, 2005 are repeated herein, to address the rejections raised in the Office action mailed January 14, 2005.

Additional amendments have been made to the specification as amended in the May 18 response.

Consideration of claims 25-46 is respectfully requested.

The present invention as recited in independent claim 25, for example, is directed to an information backup system and includes a plurality of computer systems connected to a communication network. A functionally coherent and physically distributed cache memory is comprised of a plurality of memory portions. Each memory portion is provided by the memory of a computer system amongst a first set of the computer systems. Similarly, a functionally coherent and physically distributed data storage device is comprised of a plurality of data storage portions. Each data storage portion is provided by a data storage device of a computer system from the first set of computer systems. As recited in claim 4, the cache memory operates as a data cache for I/O with the functionally coherent and physically distributed data storage device; kindly see also independent claim 44.

The rejection of claims 1 and 2 are moot. Moreover, appended claims 25-46 are neither taught nor rendered obvious in view of the disk mirroring technique disclosed by Yu or resource management in a clustered system as described by Wipfel et al.

Yu does not teach or suggest the physically distributed yet functionally coherent cache memory recited in the pending claims. Similarly, Yu does not teach or suggest the physically distributed yet functionally coherent data storage device also recited in the pending claims.

Fig. 2 of Wipfel et al. shows a Node A 106 having a local memory 218 and a shared memory 220 which is accessible by other nodes. *Col. 8, lines 11-20*. An example of their use of the shared memory 220 is a buffer in the shared memory that can be allocated to a node. *Id at lines 21-25*. Wipfel et al. do not teach providing a functionally coherent cache memory from the shared memories 220 of the nodes. In addition, and based on the foregoing example, Wipfel et al do not suggest providing using the collective shared memories 220 as a functionally coherent cache memory. Wipfel et al. do not suggest that their shared memories 220 operate as a data cache for a functionally coherent and physically distributed data storage device.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,



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